

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Coachmen Recreational Vehicle - Indiana
423 North Main Street
Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-6922-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle manufacturing source.

Responsible Official:	Michael R. Terlep, Jr.
Source Address:	423 North Main Street, Middlebury, Indiana 46540
Mailing Address:	P.O. Box 30, Middlebury, Indiana 46540
SIC Code:	3792 & 3716
County Location:	Elkhart
County Status:	Attainment
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through Stacks S5 and S6, capacity: 10.0 vehicles per hour.
- (b) Twelve (12) thinning and reducing areas (Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250), collectively known as EU14, all areas (all plants) exhausted through general ventilation systems. In addition, Plant 105 has two (2) painting booths, exhausted through Stacks S5 and S6 and Plant 210 has one (1) painting booth, each equipped with air-assisted airless and HVLP spray applicators with dry filters for overspray control, capacity: 10.0 vehicles per hour total.
- (c) Twelve (12) assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour.
- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.

- (e) Twelve (12) assembly areas for the application of general construction adhesives, collectively known as EU3, conducted in Plant 4, exhausted through V29 and general building ventilation, Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (f) Twelve (12) assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM₁₀ emissions.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because:

It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days.

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
-
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 1, 1997.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through Stacks S5 and S6, capacity: 10.0 vehicles per hour.
- (b) Twelve (12) thinning and reducing areas (Plants 4, 5, 6, 101,102,103, 105, 110, 150, 205, 210 and 250), collectively known as EU14, all areas (all plants) exhausted through general ventilation systems. In addition, Plant 105 has two (2) painting booths, exhausted through Stacks S5 and S6 and Plant 210 has one (1) painting booth, each equipped with air-assisted airless and HVLP spray applicators with dry filters for overspray control, capacity: 10.0 vehicles per hour total.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 8-2-9]

- (a) The VOC content of all materials used to coat metal shall not exceed 3.5 pounds per gallon of coating less water or shall not exceed 3.5 pounds per gallon based on a volumetric weighted average pursuant to 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from EU12 and EU14 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the VOC content limit specified in Condition D.1.1 and/or the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

$$c = n$$

$$\frac{3}{c=1} \text{ production rate (units/hour)} \times \text{coating (gallons/unit)} \times \text{VOC content (pounds/gallons of coating less water)}$$

$$c = n$$

$$3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)}$$

$$c = 1$$

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

The EU12 and EU14 dry filters for PM control shall be in operation at all times when EU12 and EU14 is in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S5 and S6 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
- (b) To document compliance with Conditions D.1.2, and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) Twelve (12) assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound [326 IAC 8-2-9]

- (a) The VOC content of all materials used to coat metal shall not exceed 3.5 pounds per gallon of coating less water or shall not exceed 3.5 pounds per gallon based on a volumetric weighted average pursuant to 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

$$c = n$$

$$\frac{3}{c} \text{ production rate (units/hour)} \times \text{coating (gallons/unit)} \times \text{VOC content (pounds/gallons of coating less water)}$$

$$c = n$$

$$3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)}$$

$$c = 1$$

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.1.
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

~~D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9][326 IAC 2-2]~~

- (a) The VOC content of all materials used to coat metal shall not exceed 3.5 pounds per gallon of coating less water or shall not exceed 3.5 pounds per gallon based on a volumetric weighted average pursuant to 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from EU9 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

$$c = n$$

$$3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)} \times \text{VOC content (pounds/gallons of coating less water)}$$

$$c = 1$$

$$c = n$$

$$3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)}$$

$$c = 1$$

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Monitoring

- (a) Monthly inspections shall be performed of the coating emissions from each stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.3.1.
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
- (b) To document compliance with Conditions D.3.2, and D.3.5, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through Stacks S5 and S6, capacity: 10.0 vehicles per hour.
- (b) Twelve (12) thinning and reducing areas (Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250), collectively known as EU14, all areas (all plants) exhausted through general ventilation systems. In addition, Plant 105 has two (2) painting booths, exhausted through Stacks S5 and S6 and Plant 210 has one (1) painting booth, each equipped with air-assisted airless and HVLP spray applicators with dry filters for overspray control, capacity: 10.0 vehicles per hour total.
- (c) Twelve (12) assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour.
- (d) Twelve (12) spray coating areas for the application of undercoating, equipped with airless or HVLP spray applicators, collectively known as EU9, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (e) Twelve (12) assembly areas for the application of general construction adhesives, collectively known as EU3, conducted in Plant 4, exhausted through V29 and general building ventilation, Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (f) Twelve (12) assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.
- (g) Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250, all exhausted through general building ventilation, capacity: 10.0 vehicles per hour total.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU12, EU14 and EU10 and any control devices.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.5 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.6 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.4.1.
- (1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM₁₀ emissions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirement

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-6922-00062

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-6922-00062

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-6922-00062

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9 1.** This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2.** This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-6922-00062
Facilities: Entire Source, Including Insignificant Activities
Parameter: Volatile Organic Compounds
Limit: 249 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review

Source Background and Description

Source Name: Coachmen Recreational Vehicle - Indiana
Source Location: 423 North Main Street, Middlebury, Indiana 46540
County: Elkhart
SIC Code: 3716 and 3792
Operation Permit No.: T 039-6922-00062
Permit Reviewer: Mark L. Kramer

The Office of Air Management (OAM) has reviewed a Part 70 Permit application from Coachmen Recreational Vehicle - Indiana relating to the operation of a recreational vehicle manufacturing source.

The applicant originally requested that a new spray booth (EU15) as their alternative operating scenario be permitted as part of an Enhanced New Source Review. On August 26, 1997, the applicant withdrew this request.

Source Definition

- (a) This recreational vehicle manufacturing company consists of twenty-two (22) plants (Plants 4 - 11, 101 - 105, 110, 150, 201 - 205, 210 and 250), all located at 423 North Main Street, Middlebury, Indiana 46540.

Since the twenty-two (22) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

- (b) Coachmen Recreational Vehicle - Indiana is located in the Yoder Industrial Park complex along with Viking Formed Products. Both companies are commonly owned by Coachmen Industries, Inc., however, Viking Formed Products have a different first two-digit SIC code (30) than Coachmen Recreational Vehicle - Indiana (37). Less than 15 percent of the Viking Formed products are supplied to Coachmen Recreational Vehicle - Indiana. Therefore, these two companies will not be combined and will be treated as two (2) separate sources.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through S5 and S6, capacity: 6.12 vehicles per hour.

- (b) Ten (10) thinning and reducing area, collectively known as EU14, equipped with air assisted airless and HVLP spray applicators and dry filters for overspray control, conducted in Plant 4, exhausted through V29, Plant 5, exhausted through S1 and S2, Plants 6, 101, 102, 103, 105, 150, 210 and Plant 250, all exhausted through general building ventilation, capacity: 6.12 vehicles per hour.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (c) Eleven (11) assembly areas for the application of general construction adhesives, collectively known as EU3, conducted in Plant 4, exhausted through V29, Plants 5, 6, 101, 102, 103, 105, 110, 150, 205 and Plant 250, all exhausted through general building ventilation, capacity: 6.41 vehicles per hour.
- (d) Eight (8) assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants 6, 101, 102, 103, 110, 150, 205 and Plant 250, all exhausted through general building ventilation, capacity: 6.41 vehicles per hour.
- (e) Eight (8) assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants 6, 101, 102, 103, 110, 150, 205 and Plant 210, all exhausted through general building ventilation, capacity: 6.41 vehicles per hour.
- (f) Seven (7) spray coating areas for the application of undercoating, collectively known as EU9, equipped with air atomization spray applicators conducted in Plants 6, 102, 103, 110, 150, 205 and Plant 210, all exhausted through general building ventilation, capacity: 3.99 vehicles per hour.
- (g) Eleven (11) parts and equipment cleaning areas, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 102, 103, 110, 150, 205, 210 and Plant 250, all exhausted through general building ventilation, capacity: 6.41 vehicles per hour.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed on the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) Refractory storage not requiring air pollution control equipment.

- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (g) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (h) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM₁₀ emissions.

Existing Approvals

The source has been operating under the following approvals:

Operation Permit No. 20-02-91-0666 issued April 26, 1986
Operation Permit No. 20-02-91-0667 issued April 26, 1986

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Permit application for the purposes of this review was received on October 15, 1996. Additional information was received on August 15, 22, and 26, November 12, 1997 as well as on April 13, 1998.

A notice of completeness letter was mailed to the source on October 31, 1996.

Emission Calculations

See pages 1 - 6 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM ₁₀	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	greater than 10
Hexane	greater than 10
Methanol	less than 10
1,1,1 Trichloroethane	less than 10
Xylene	less than 10
Dibutyl phthalate	less than 10
MEK	greater than 10
Methylene Chloride	less than 10
Glycol Ethers	greater than 10
Ethyl Benzene	less than 10
MIBK	less than 10
Phenol	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects OAM 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.951
PM ₁₀	0.585
SO ₂	0.00
VOC	78.6
CO	0.00
NO _x	0.00
Dibutyl phthalate	0.200
Glycol Ethers	0.041
Formaldehyde	0.012
Hexane	29.4
Hydroquinone	0.003
Methanol	3.29
1,1,1 Trichloroethane	1.28
MEK	12.2
MIBK	0.161
Methylene Chloride	2.05
Toluene	32.8
Vinyl Acetate	0.001
Xylene	0.982
Chromium Compounds	0.452

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units. The VOC emission limits below are proposed by the applicant so that the source avoids PSD major source status and will be limited on a fixed month basis. The fixed monthly VOC emission limit is obtained by dividing the limited potential to emit values in tons per year by twelve (12), e.g., for EU 12 and EU14, the monthly limit is 2.00 tons per month, total.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
EU3	0.00	0.00	0.00	55.0	0.00	0.00	35.8
EU7	0.00	0.00	0.00	80.0	0.00	0.00	75.3
EU8	0.00	0.00	0.00	5.40	0.00	0.00	5.40
EU9	19.9	19.9	0.00	35.9	0.00	0.00	0.00
EU10	0.00	0.00	0.00	31.8	0.00	0.00	9.87
EU12 & EU14	0.596	0.596	0.00	24.0	0.00	0.00	12.4
Insignificant Activities	15.0	10.0	1.00	17.0	1.00	2.00	5.00
Total Emissions	35.5	30.5	1.00	249	1.00	2.00	144

Note that the PM, PM₁₀, and HAPs limited potential emissions have been determined by multiplying the potential emissions after controls by the ratio of the VOC limit over the VOC potential before controls by EU.

Attached Tables 1 - 6 summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Wood Furniture Manufacturing Operations, 326 IAC 14, (40 CFR 60.800 Subpart JJ). A copy of the federal rule is attached to the Part 70 Permit. These Federal rules require compliant coatings in finishing operations, compliant cleaning solvents and compliant contact adhesives in order to limit the emissions of hazardous air pollutants.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source has accepted a source-wide VOC limit of 249 tons per year to retain its minor source status under this rule.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year for specific Elkhart County of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Regulations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitation: Visible Emission Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.

- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations: Particulate Emission Limitations)

The spray operations in EU9, EU12 and EU14 shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows: $E = 4.10 P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour, $E = 55.0 P^{0.11} - 40$. EU12 and EU14 will comply by the use of dry filters.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements For New Facilities)

Emission Units 3, 7, 8, and 10 were installed prior to 1976 and coat fiberglass and rubber. Therefore since these emission units were installed prior to January 1, 1980, 326 IAC 8-1-6 is not applicable.

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations)

EU7, EU9 and EU12 coat metal and have potential VOC emissions of more than 15 pounds per day in Elkhart County. Therefore, EU7, EU9 and EU12 are subject to the surface coating requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) which limits the VOC content of materials to coat metal 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings. The materials used in EU7 and EU9 comply with these requirements based on the MSDS and the materials used in EU12 and EU14 combined with EU7 and EU9 will comply with the requirements based on a daily volume weighted average as calculated with the following equation, excluding clean-up solvents.

c = n

$$\frac{3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)} \times \text{VOC content (pounds/gallons of coating less water)}}{c = 1}$$

c = n

$$\frac{3 \text{ production rate (units/hour)} \times \text{coating (gallons/unit)}}{c = 1}$$

The coatings on metal in EU7, EU9, EU12 and EU14 comply with this rule based on a volume weighted average of 3.50 pounds of VOC per gallon of coating less water.

326 IAC 8-2-12 (Surface Coating Emission Limitations: Wood Furniture and Cabinet Coating)

The General Construction Adhesives of EU3 hand application to coat wood are in compliance with the acceptable applicator methods prescribed in this rule.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The installation dates of emission units (EU7, EU8 and EU10) were prior to 1972 based on the Coachmen Industries, Inc. 1972 Annual Report. Therefore, these facilities with a current potential VOC emission rate of greater than 100 tons per year are not subject to 326 IAC 8-6 since the facilities at this source were constructed and operated prior to the October 7, 1974 applicability date for this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The surface coating operations have applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70).

EU12 has an additional applicable compliance monitoring conditions as specified below:

The VOC content of materials used to coat metal in EU12 must be monitored and recorded on a daily basis. The daily volume weighted average must be reported on a quarterly basis.

This monitoring condition is necessary to ensure compliance with 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations on pages 3 - 6 of 6 of Appendix A for detailed air toxic calculations.
- (c) 326 IAC 2-1-3.4 (New Source Toxic Control) does not apply to this source because all emission units were constructed and operated July 27, 1997.

Conclusion

The operation of this recreational vehicle manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 039-6922-00062.

**Appendix A: Potential Emissions Calculations
VOC and Particulate From Surface Coating Operations**

Company Name: Coachmen Recreational Vehicle - Indiana
Address City IN Zip: 423 North Main Street, Middlebury, IN 46540
Part 70: T039-6922
Pit ID: T039-00062
Reviewer: Mark L. Kramer
Date: October 15, 1997

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Material Substrate
EU3 General Construction Adhesives - Complexwide																		
Construction Adhesive 40	9.54	33.00%	0.00%	33.0%	0.00%	N/A	0.29300	6.410	1.000	3.15	3.15	5.91	141.91	25.90	0.00	N/A	100%	wood, fiberglass
(2)676 High Perf. Spray Adhesive	5.70	82.30%	0.00%	82.3%	0.00%	12.30%	0.49300	6.410	1.000	4.69	4.69	14.82	355.79	64.93	0.00	38.14	100%	wood, fabric, insulation, fiberglass
Hartco 80 Adhesive	9.83	28.00%	22.00%	6.0%	25.93%	N/A	0.02400	6.410	1.000	0.80	0.59	0.09	2.18	0.40	0.00	N/A	100%	wood
Hartco 50 Adhesive	10.50	21.72%	13.00%	8.7%	16.36%	N/A	0.01200	6.410	1.000	1.09	0.92	1.69	0.31	0.00	0.00	N/A	100%	wood
Hartco Plank Adhesive 40	11.66	38.00%	0.00%	38.0%	0.00%	N/A	0.00900	6.410	1.000	4.43	4.43	0.26	6.13	1.12	0.00	N/A	100%	wood
TAC Bond 724	8.25	39.00%	37.00%	2.0%	36.00%	59.00%	0.00900	6.410	1.000	0.26	0.16	0.01	0.23	0.04	0.00	0.28	100%	wood
EU7 RV CAULKS & SEALANTS - COMPLEX WIDE																		
Silicone Glazing Sealant (All colors)	8.66	3.75%	0.00%	3.8%	0.0%	N/A	0.04200	6.410	1.000	0.32	0.32	0.09	2.10	0.38	0.00	N/A	100%	metal, wood, plastic, fiberglass
Vulkum Polyurethane Sealant (616 & 626)	11.00	15.00%	0.00%	15.0%	0.0%	90.00%	0.11000	6.410	1.000	1.65	1.65	1.16	27.92	5.10	0.00	1.83	100%	metal, wood
Pemco	8.83	0.00%	0.00%	0.0%	0.0%	56.00%	0.07100	6.410	1.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	glass, rubber
SM 5522	8.80	32.74%	0.00%	32.7%	0.0%	62.70%	0.02700	6.410	1.000	2.88	2.88	0.50	11.97	2.18	0.00	4.60	100%	fiberglass
Parasil 929 thru 936 series	8.66	3.50%	0.00%	3.5%	0.0%	50.00%	0.05100	6.410	1.000	0.30	0.30	0.10	2.38	0.43	0.00	0.61	100%	rubber
Butyl Caulk	10.50	25.00%	0.00%	25.0%	0.0%	N/A	0.00400	6.410	1.000	2.63	2.63	0.07	1.62	0.29	0.00	N/A	100%	fiberglass
Colorimetric Polyurethane Sealant	10.41	3.30%	0.00%	3.3%	0.0%	96.70%	0.05600	6.410	1.000	0.34	0.34	0.12	2.96	0.54	0.00	0.36	100%	fiberglass
Colorimetric Silicone (all colors)	8.66	5.00%	0.00%	5.0%	0.0%	95.00%	0.18500	6.410	1.000	0.43	0.43	0.51	12.32	2.25	0.00	0.46	100%	fiberglass
Colorimetric Caulk (gray)	8.33	37.50%	0.00%	37.5%	0.0%	60.00%	0.00000	6.410	1.000	3.12	3.12	0.00	0.00	0.00	0.00	5.21	100%	fiberglass
Sikaflex 255-FC & 268-543	9.80	6.00%	0.00%	6.0%	0.0%	97.00%	0.06800	6.410	1.000	0.59	0.59	0.26	6.15	1.12	0.00	0.61	100%	fiberglass
Parbond Clear	7.50	55.00%	0.00%	55.0%	0.0%	N/A	0.00800	6.410	1.000	4.13	4.13	0.21	5.08	0.93	0.00	N/A	100%	vinyl
Pemco Roof Sealant (all colors)	7.25	45.00%	0.00%	45.0%	0.0%	N/A	0.01700	6.410	1.000	3.26	3.26	0.36	8.53	1.56	0.00	N/A	100%	rubber
Dicor Roof Sealant	10.13	46.00%	0.00%	46.0%	0.0%	70.00%	0.91600	6.410	1.000	4.66	4.66	27.36	656.65	119.84	0.00	6.66	100%	rubber
EU8 RV PLUMBING (CLEANERS AND ADHESIVES)																		
ABS Plastic Pipe Cement	7.00	85.00%	0.00%	85.0%	0.0%	N/A	0.05400	6.410	1.000	5.95	5.95	2.06	49.43	9.02	0.00	N/A	100%	pvc, abs, plastic
EU9 UNDERCOATING - COMPLEX WIDE																		
Undercoating with Spray Gun (Seal N Sound)	7.34	47.00%	0.00%	47.0%	0.0%	49.00%	0.98200	3.990	1.000	3.45	3.45	13.52	324.41	59.20	33.38	7.04	50%	metal
EU10 RV/RV PARTS AND EQUIPMENT CLEANING																		
Isopropanol	6.51	100.00%	0.00%	100.0%	0.0%	0.00%	0.04700	6.410	1.000	6.51	6.51	1.96	47.07	8.59	0.00	N/A	100%	metal, fiberglass, plastic
Methylene Chloride	11.00	100.00%	0.00%	100.0%	0.0%	0.00%	0.00100	6.410	1.000	11.00	11.00	0.07	1.69	0.31	0.00	N/A	100%	metal
Mineral Spirits	6.58	100.00%	0.00%	100.0%	0.0%	0.00%	0.07500	6.410	1.000	6.58	6.58	3.16	75.92	13.86	0.00	N/A	100%	metal, fiberglass, plastic
Denatured Alcohol	6.78	100.00%	4.00%	96.0%	3.26%	0.00%	0.00200	6.410	1.000	6.73	6.51	0.08	2.00	0.37	0.00	N/A	100%	metal, fiberglass
Lacquer Thinner	8.08	100.00%	56.00%	44.0%	68.14%	0.00%	0.03000	6.410	1.000	11.16	3.56	0.68	16.41	2.99	0.00	N/A	100%	metal
Enamel Reducer 3812	7.50	100.00%	0.00%	100.0%	0.0%	0.00%	0.11500	6.410	1.000	7.50	7.50	5.53	132.69	24.22	0.00	N/A	100%	metal, fiberglass, plastic
Glass Cleaner	8.01	100.00%	0.00%	100.0%	0.0%	0.00%	0.00700	6.410	1.000	8.01	8.01	0.36	8.63	1.57	0.00	N/A	100%	glass
C60 Solvent Degreaser	8.33	96.60%	0.00%	96.6%	0.0%	3.63%	0.00400	6.410	1.000	8.05	8.05	0.21	4.95	0.90	0.00	221.67	100%	metal, fiberglass, plastic
Orange 88 Degreaser	8.30	10.00%	0.00%	10.0%	0.0%	96.04%	0.02800	6.410	1.000	0.83	0.83	0.15	3.58	0.65	0.00	0.86	100%	metal, fiberglass, plastic
EU12 RV COATING - FRAME PAINTING (PRIMER)																		
Gray Water Reducible Enamel	10.35	56.19%	42.37%	13.8%	49.67%	28.80%	0.32200	3.820	1.000	2.84	1.43	1.76	42.23	7.71	6.11	4.97	75%	metal
EU12 RV COATING - FRAME PAINTING																		
Black Water Reducible Enamel	8.50	72.89%	56.42%	16.5%	57.58%	21.00%	0.99300	3.820	1.000	3.30	1.40	5.31	127.45	23.26	9.57	6.67	75%	metal
Automotive Paint	10.83	48.00%	0.00%	48.0%	0.00%	40.00%	0.21300	2.290	1.000	5.20	5.20	2.54	60.85	11.11	3.01	13.00	75%	metal
EU12 RV COATING - ENAMEL																		
Gloss Black Paint - Aerosol	6.08	90.00%	20.00%	70.0%	18.32%	N/A	0.11900	6.120	1.000	5.21	4.26	3.10	74.39	13.58	0.48	N/A	75%	metal
EU14 PAINT THINNER/REDUCERS																		
Lacquer Thinner	6.99	100.00%	0.00%	100.0%	0.0%	0.00%	0.01400	6.120	1.000	6.99	6.99	0.60	14.37	2.62	0.00	N/A	75%	metal
Primer Reducer	8.00	89.00%	0.00%	89.0%	0.0%	50.00%	0.08500	6.120	1.000	7.12	7.12	3.70	88.89	16.22	0.50	14.24	75%	metal
Gun Cleaner	9.51	95.00%	0.0%	95.0%	0.0%	5.00%	0.00300	6.120	1.000	9.03	9.03	0.17	3.98	0.73	0.01	180.69	75%	metal
Toluene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	0.02100	6.120	1.000	7.26	7.26	0.93	22.39	4.09	0.00	N/A	75%	metal
Subtotal VOC (TPY)												EU3 = 92.7, EU7 = 134.6, EU8 = 9.02						
												EU9 = 59.2, EU10 = 53.5						
												EU12 = 55.7 & EU14 = 23.7						
State Potential Emissions												97.8	2347	428	53.1			
Add worst case coating to all solvents																		

Control Technology Emissions (Combustion)						Emission Factors						Emissions					
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO		
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr		
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0	0.0	0.0	0.0	0.0	0.0	0.0		
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0	0.0	0.0	0.0	0.0	0.0	0.0		
Total			0.0							0.0	0.0	0.0	0.0	0.0	0.0		
										Control Efficiency	Controlled	Controlled	Controlled	Controlled	Controlled		
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate		
										0.90		per hour	per day	tons/yr	tons/yr		

Controlled Emissions due to Surface Coating Operations and Controls

97.82346.9428.335.3

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off

Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Coachmen Recreational Vehicle - Indiana
 Plant Location: 423 North Main Street, Middlebury, IN 46540
 Part 70: T039-6922
 Plt ID: T039-00062
 County: Elkhart
 Permit Reviewer: Mark L. Kramer
 Date: October 15, 1996

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Toluene	Weight % Hexane	Weight % Methanol	Weight % 1,1,1 trichloro- ethane	Weight % Xylene	Weight % Dibutyl phthalate	Weight % MEK	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Methanol Emissions (tons/yr)	1,1,1 trichloro- ethane Emissions (tons/yr)	Xylene Emissions (tons/yr)	Dibutyl Emissions (tons/yr)	MEK Emissions (tons/yr)
EU3 General Construction Adhesives - Complexwide																		
Construction Adhesive 40	9.54	0.29300	6.410	1.00	30.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.54	3.92	0.00	0.00	0.00	0.00	0.00
(2)676 High Perf. Spray Adhesive	5.70	0.49300	6.410	1.00	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	31.56	0.00	0.00	0.00	0.00	0.00
Hartco 80 Adhesive	9.83	0.02400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hartco 50 Adhesive	10.50	0.01200	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hartco Plank Adhesive 40	11.66	0.00900	6.410	1.00	0.00%	0.00%	0.00%	38.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	1.12	0.00	0.00	0.00
TAC Bond 724	8.25	0.00900	6.410	1.00	1.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.02	0.00	0.10	0.00	0.00	0.00	0.00
EU7 RV CAULKS & SEALANTS- COMPLEX WIDE																		
Silicone Glazing Sealant (All colors)	8.66	0.04200	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vulkum Polyurethane Sealant (616 & 626)	11.00	0.11000	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pemco	8.83	0.07100	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.53	0.00
SM 5522	8.80	0.02700	6.410	1.00	33.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.21	0.00	0.00	0.00	0.00	0.00	0.00
Parasil 929 thru 936 series	8.66	0.05100	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Butyl Caulk	10.50	0.00400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colorimetric Polyurethane Sealant	10.41	0.05600	6.410	1.00	0.00%	0.00%	0.00%	0.00%	3.30%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.54	0.00	0.00
Colorimetric Silicone (all colors)	8.66	0.18500	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colorimetric Caulk (gray)	8.33	0.00000	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sikaflex 255-FC & 268-543	9.80	0.06800	6.410	1.00	0.00%	0.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.12	0.00	0.00
Parbond Clear	7.50	0.00800	6.410	1.00	55.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.93	0.00	0.00	0.00	0.00	0.00	0.00
Pemco Roof Sealant (all colors)	7.25	0.01700	6.410	1.00	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.56	0.00	0.00	0.00	0.00	0.00	0.00
Dicor Roof Sealant	10.13	0.91600	6.410	1.00	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	119.84	0.00	0.00	0.00	0.00	0.00	0.00
EU8 RV PLUMBING (CLEANERS AND ADHESIVES)																		
ABS Plastic Pipe Cement	7.00	0.05400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	85.00%	0.00	0.00	0.00	0.00	0.00	0.00	9.02
EU9 UNDERCOATING - COMPLEX WIDE																		
Undercoating with Spray Gun (Seal N Sound)	7.34	0.98200	3.990	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU10 RV/RV PARTS AND EQUIPMENT CLEANING																		
Isopropanol	6.51	0.04700	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Methylene Chloride	11.00	0.00100	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mineral Spirits	6.58	0.07500	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Denatured Alcohol	6.78	0.00200	6.410	1.00	0.00%	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.02	0.00	0.00	0.00	0.00
Lacquer Thinner	8.08	0.03000	6.410	1.00	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.36	0.00	0.00	0.00	0.00	0.00	0.00
Enamel Reducer 3812	7.50	0.11500	6.410	1.00	51.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	12.35	0.00	0.00	0.00	0.00	0.00	0.00
Glass Cleaner	8.01	0.00700	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
C60 Solvent Degreaser	8.33	0.00400	6.410	1.00	0.00%	0.00%	0.00%	96.60%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.90	0.00	0.00	0.00
Orange 88 Degreaser	8.30	0.02800	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU12 RV COATING - FRAME PAINTING (PRIMER)																		
Gray Water Reducible Enamel	10.35	0.32200	3.820	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU12 RV COATING - FRAME PAINTING																		
Black Water Reducible Enamel	8.50	0.99300	3.820	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Automotive Paint	10.83	0.21300	2.290	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU12 RV COATING - ENAMEL																		
Gloss Black Paint - Aerosol	6.23	0.11900	6.110	1.00	12.00%	0.00%	0.00%	0.00%	18.00%	0.00%	0.00%	2.38	0.00	0.00	0.00	3.57	0.00	0.00

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Toluene	Weight % Hexane	Weight % Methanol	Weight % 1,1,1 trichloro- ethane	Weight % Xylene	Weight % Dibutyl phthalate	Weight % MEK	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Methanol Emissions (tons/yr)	1,1,1 trichloro- ethane Emissions (tons/yr)	Xylene Emissions (tons/yr)	Dibutyl Emissions (tons/yr)	MEK Emissions (tons/yr)
EU14 PAINT THINNER/REDUCERS																		
Lacquer Thinner	6.99	0.01400	6.120	1.00	55.00%	0.00%	15.00%	0.00%	0.00%	0.00%	5.00%	1.44	0.00	0.39	0.00	0.00	0.00	0.13
Primer Reducer	8.00	0.08500	6.120	1.00	15.00%	0.00%	0.00%	0.00%	10.00%	0.00%	15.00%	2.73	0.00	0.00	0.00	1.82	0.00	2.73
Gun Cleaner	9.51	0.00300	6.120	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Toluene	7.26	0.02100	6.120	1.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.09	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

TOTALS:	(tons/yr):	172.450	35.482	0.513	2.023	7.057	0.528	11.886
	(lbs/hr):	39.407	8.108	0.117	0.462	1.613	0.121	2.716
	(g/sec):	4.965	1.022	0.015	0.058	0.293	0.015	0.342

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Methylene Chloride	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % MIBK	Weight % Phenol	Weight %	Weight %	Methylene Chloride Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Phenol Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)
EU3 General Construction Adhesives - Complexwide																		
Construction Adhesive 40	9.54	0.29300	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
(2)676 High Perf. Spray Adhesive	5.70	0.49300	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Hartco 80 Adhesive	9.83	0.02400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Hartco 50 Adhesive	10.50	0.01200	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Hartco Plank Adhesive 40	11.66	0.00900	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
TAC Bond 724	8.25	0.00900	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU7 RV CAULKS & SEALANTS- COMPLEX WIDE																		
Silicone Glazing Sealant (All colors)	8.66	0.04200	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Vulkum Polyurethane Sealant (616 & 626)	11.00	0.11000	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Pemco	8.83	0.07100	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
SM 5522	8.80	0.02700	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Parasil 929 thru 936 series	8.66	0.05100	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Butyl Caulk	10.50	0.00400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Colorimetric Polyurethane Sealant	10.41	0.05600	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Colorimetric Silicone (all colors)	8.66	0.18500	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Colorimetric Caulk (gray)	8.33	0.00000	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Sikallex 255-FC & 268-543	9.80	0.06800	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Parbond Clear	7.50	0.00800	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Pemco Roof Sealant (all colors)	7.25	0.01700	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Dicor Roof Sealant	10.13	0.91600	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU8 RV PLUMBING (CLEANERS AND ADHESIVES)																		
ABS Plastic Pipe Cement	7.00	0.05400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU9 UNDERCOATING - COMPLEX WIDE																		
Undercoating with Spray Gun (Seal N Sound)	7.34	0.98200	3.990	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU10 RV/RV PARTS AND EQUIPMENT CLEANING																		
Isopropanol	6.51	0.04700	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Methylene Chloride	11.00	0.00100	6.410	1.00	100.00%	0.00%	0.00%	0.00%	0.00%			0.31	0.00	0.00	0.00	0.00		
Mineral Spirits	6.58	0.07500	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Denatured Alcohol	6.78	0.00200	6.410	1.00	0.00%	0.00%	0.00%	1.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Lacquer Thinner	8.08	0.03000	6.410	1.00	0.00%	6.00%	0.00%	0.00%	0.00%			0.00	0.41	0.00	0.00	0.00		
Enamel Reducer 3812	7.50	0.11500	6.410	1.00	0.00%	5.00%	0.00%	0.00%	0.00%			0.00	1.21	0.00	0.00	0.00		
Glass Cleaner	8.01	0.00700	6.410	1.00	0.00%	5.00%	0.00%	0.00%	0.00%			0.00	0.08	0.00	0.00	0.00		
C60 Solvent Degreaser	8.33	0.00400	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Orange 88 Degreaser	8.30	0.02800	6.410	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU12 RV COATING - FRAME PAINTING (PRIMER)																		
Gray Water Reducible Enamel	10.35	0.32200	3.820	1.00	0.00%	6.00%	0.00%	0.00%	0.00%			0.00	3.35	0.00	0.00	0.00		
EU12 RV COATING - FRAME PAINTING																		
Black Water Reducible Enamel	8.50	0.99300	3.820	1.00	0.00%	12.00%	0.00%	0.00%	0.00%			0.00	16.95	0.00	0.00	0.00		
Automotive Paint	10.83	0.21300	2.290	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
EU12 RV COATING - ENAMEL																		
Gloss Black Paint - Aerosol	6.23	0.11900	6.110	1.00	0.00%	0.00%	3.00%	0.00%	0.00%			0.00	0.00	0.60	0.00	0.00		

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Methylene Chloride	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight % MIBK	Weight % Phenol	Weight %	Weight %	Methylene Chloride Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Phenol Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)
EU14 PAINT THINNER/REDUCERS																		
Lacquer Thinner	6.99	0.01400	6.120	1.00	0.00%	0.00%	0.00%	15.00%	0.00%			0.00	0.00	0.00	0.39	0.00		
Primer Reducer	8.00	0.08500	6.120	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		
Gun Cleaner	9.51	0.00300	6.120	1.00	60.00%	0.00%	0.00%	0.00%	10.00%			0.46	0.00	0.00	0.00	0.08		
Toluene	7.26	0.02100	6.120	1.00	0.00%	0.00%	0.00%	0.00%	0.00%			0.00	0.00	0.00	0.00	0.00		

Total State Potential Emissions

Subtotals	(tons/yr):	0.768	21.990	0.595	0.397	0.076		
	(lbs/hr):	0.175	5.025	0.136	0.091	0.017		
	(g/sec):	0.022	0.633	0.017	0.011	0.002		
Total HAPs	(tons/yr):	253.8						

Subtotal of All HAPs by EU	TPY
EU3	60.3
EU7	126.7
EU8	9.02
EU9	0.0
EU10	16.6
EU12 & EU14	41.1
Total	253.8

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name:	Coachmen Recreational Vehicle - Indiana
Source Location:	423 North Main Street, Middlebury, Indiana 46540
County:	Elkhart
Part 70 Operating Permit:	OP T 039-6922-00062
SIC Code:	3716 and 3792
Permit Reviewer:	Mark L. Kramer

On May 7, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Coachmen Recreational Vehicle, Indiana, had applied for a Part 70 Operating Permit to operate a recreational vehicle manufacturing source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. Section A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

SECTION B

3. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential,~~ the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

5. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

7. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- (b) (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- (c) (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- (e) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 **Deviations from Permit Requirements and Conditions** [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (b) (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (e) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**
- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**
- Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

11. Condition B.26 (now B.24) (Inspection and Entry) has removed “IDEM”, since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

12. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

SECTION C

14. Condition C.1 has been deleted:

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

- ~~(a) The total source potential to emit VOC is limited to 249 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
- ~~(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~

15. Condition C.1 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added and the remaining conditions have been renumbered accordingly.

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.2 (Opacity) has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998. as follows:

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions ~~Opacity~~ Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

- (a) **~~Visible emissions~~ Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) **~~Visible emissions~~ Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

17. Condition C.6 (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment is **(are)** in operation. ~~as described in Section D of this permit. (Be sure to specify in Section A, any equipment that does not need to be operated at all times, but only at the source's discretion.)~~

18. Condition C.7 (Asbestos Abatement Projects- Accreditation) and Condition C.12 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

**Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

19. Condition C.8 (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~326 IAC 3-2-1~~ [326 IAC 3-6]

- (a)** All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b)** All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. Condition C.9 (Compliance Schedule) has been changed as follows:

C.9	Compliance Schedule [326 IAC 2-7-6(3)] (Check Applicability)
<hr/> The Permittee:	
(a)	Has certified that all facilities at this source are in compliance with all applicable requirements; and Will continue to comply with such requirements that become effective during the term of this permit; and
(b)	Has submitted a statement that the Permittee will continue to comply with such requirements; and
(c)	Will comply with such applicable requirements that become effective during the term of this permit. Has certified that all facilities at this source are in compliance with all applicable requirements.

21. Condition C.10 (Compliance Monitoring) has been changed as follows:

C.10	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
<hr/> Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee shall notifies: Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 in writing, prior to the end of the initial ninety (90) day compliance schedule no more than ninety (90) days (this time frame is determined on a case by case basis) after receipt of this permit, with full justification of the reasons for the inability to meet this date, and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved. The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).	

22. Condition C.11 (Monitoring Methods) has been changed as follows:

C.11	Monitoring Methods [326 IAC 3]
<hr/> Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.	

23. Condition C.12 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.7 (Asbestos Abatement Projects).

~~C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- ~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~
- ~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~
- ~~(2) If there is a change in the following:~~
- ~~(A) Asbestos removal or demolition start date;~~
- ~~(B) Removal or demolition contractor; or~~
- ~~(3) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

- ~~(e) Procedures for Asbestos Emission Control~~
~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

- (f) ~~Indiana Accredited Asbestos Inspector~~
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

24. Condition C.13 (now C.12) (Emergency Reduction Plans) has been changed as follows:

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

25. Condition C.14 (now C.13) (Risk Management Plan) has been changed as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

26. Condition C.15 (now C.14) (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]**[326 IAC 2-7-6] [326 IAC 1-6]**

27. Condition C.16 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

28. Condition C.17 (now C.16) (Emission Statement) part (a) has been changed as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]

-
- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

29. Condition C.19 (now C.18) (General Record Keeping Requirements) has been changed as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][**326 IAC 2-7-6**]

-
- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

30. Condition C.20 (now C.19) (General Reporting Requirements) has had the word “Quality” changed to “Quarterly”, and the following language has been added:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

-
- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
 - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D

FACILITY OPERATION CONDITIONS

31. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds

Facility Description [326 IAC 2-7-5(15)]

32. Condition D.1.4 (now D.1.3) (Testing Requirements) have been changed as follows.

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and/or the particulate matter specified in Condition D1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

and similarly now in Conditions D.2.2, D.3.3, D.4.3 and D.5.2.

33. Condition D.1.5 (now D.1.4) (Volatile Organic Compounds) has had the rule cites changed.

D.1.5 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

and similarly now in Conditions D.2.3 and D.3.4 as well as the following now in Condition D.4.4.

D.4.4 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC ~~content and~~ usage limitations contained in Condition D.4.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

34. Condition D.4.5 (VOC Emissions) has been added as follows:

D.4.5 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

35. D.3.5 (Monitoring) has been changed as follows.

D.3.5 Monitoring

- (a) ~~Monthly Weekly~~ inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

36. Section D.5 has been added for the insignificant activities that have applicable state rules

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Woodworking with cyclone and baghouse with less than 5 pounds per hour and 25 pounds per day of PM₁₀ emissions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Compliance Determination Requirement

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Forms

37. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in form as follows.
38. The Quarterly Compliance Report is now called the Quarterly Compliance **Monitoring** Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.
39. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following pages.
40. Conditions D.2.3(b) and 3.4(b) have been added to show the method required to calculate the volume weighted average VOC content to demonstrate compliance with 326 IA 8-2-9 as follows:

(b) The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

$$c = n$$

$$\frac{3}{c} \text{ production rate (units/hour)} \times \text{coating (gallons/unit)} \times \text{VOC content (pounds/gallons of coating less water)}$$

$$c = 1$$

$$c = n$$

$$\frac{3}{c} \text{ production rate (units/hour)} \times \text{coating (gallons/unit)}$$

$$c = 1$$

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039 - 6922-00062

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039 - 6922-00062

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations". **in the box marked "No deviations occurred this reporting period".**

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

On June 3, 1998, John R. Cribbs, Coachmen Industries, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

COMMENT 1:

Condition A.2 (a), Page 6 of 54 - Please indicate capacity as 10 vehicle frames per hour. Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour.

COMMENT 2:

Condition A.2(b), Page 6 of 54 - Please rewrite condition to read *"Twelve (12) thinning and reducing areas, collectively known as EU-14, equipped with air assisted airless and HVLP applicators, conducted in Plant 5 exhausted through S1 and S2, and Plants 4, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve coating areas in aggregate: ten (10) vehicles per hour."* Reason - Some application of coatings occurs in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

COMMENT 3:

Condition A.2(c), Page 6 of 54 - Please rewrite condition to read *"Twelve (12) assembly areas for the application of general construction adhesives, collectively known as EU-3, conducted in Plant 4 exhausted through V29 and general building ventilation, Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Some application of adhesives occurs in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

COMMENT 4:

Condition A.2(d), Page 6 of 54 - Please rewrite condition to read *"Twelve (12) assembly areas for the application of caulks and sealants, collectively known as EU-7, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Some application of caulks and sealants occurs in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

COMMENT 5:

Condition A.2(e), Page 6 of 54 - Please rewrite condition to read *"Twelve (12) assembly areas for the application of plumbing adhesives, collectively known as EU-8, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Some application of plumbing adhesives occurs in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

COMMENT 6:

Condition A.2(f), Page 6 of 54 - Please rewrite condition to read *"Twelve (12) areas for the application of undercoating, collectively known as EU-9, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve undercoating areas in aggregate: ten (10) vehicles per hour."* Reason - Some application of undercoating can occur in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

COMMENT 7:

Condition A.2(g), Page 7 of 54, Please rewrite condition to read *"Twelve (12) cleaning areas for the cleaning of product surfaces, collectively known as EU-10, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve cleaning areas in aggregate: ten (10) vehicles per hour."* Reason - Some product cleaning occurs in each of these buildings. Application misstated capacity of this facility. Actual capacity is ten (10) vehicles per hour.

RESPONSES 1 - 7:

The equipment list in Condition A.2 has been revised to address the Comments 1 - 7 as well as in Sections D.1, D.2, D.3 and D.4 to address the similar Comments 9, 15, 25, 32, 40 and 49, in addition the Sections have been reordered to group the entire source in Section D.4 and keep the emission units subject to 326 IAC 8-2-9 in sequence as follows:

- (a) One (1) frame spray coating area, known as EU12, equipped with HVLP spray applicators and dry filters for overspray control, conducted in Plant 105, exhausted through S5 and S6, capacity: ~~6-12~~ **10.0** vehicles per hour.
- (b) ~~Ten (10)~~ **Twelve (12)** thinning and reducing areas, (**Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210 and 250**) collectively known as EU14, **all areas (all plants) exhausted through general ventilation systems. In addition, Plant 105 has two (2) painting booths, exhausted through Stacks S5 and S6 and Plant 210 has one (1) painting booth, each** equipped with air assisted airless and HVLP spray applicators with ~~and~~ dry filters for overspray control, ~~conducted in Plant 4, exhausted through V29, Plant 5, exhausted through S1 and S2, and Plants 4, 6, 101, 102, 103, 105, 110, 150, 205, 210 and Plant 250, all exhausted through general building ventilation,~~ capacity: ~~6-12~~ **10.0** vehicles per hour **total**.
- (~~e~~)**(e)** ~~Eleven (11)~~ **Twelve (12)** assembly areas for the application of general construction adhesives, collectively known as EU3, conducted in Plant 4, exhausted through V29 **and general building ventilation**, Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, **210** and ~~Plant 250~~, all exhausted through general building ventilation, capacity: ~~6-44~~ **10.0** vehicles per hour **total**.
- (~~c~~)**(d)** ~~Eight (8)~~ **Twelve (12)** assembly areas for the application of caulks and sealants, collectively known as EU7, conducted in Plants **4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210** and ~~Plant 250~~, all exhausted through general building ventilation, capacity: ~~6-44~~ **10.0** vehicles per hour.

- (f)(e) ~~Eight (8)~~ **Twelve (12)** assembly areas for the application of plumbing adhesives, collectively known as EU8, conducted in Plants **4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210** and ~~Plant 240~~ **250**, all exhausted through general building ventilation, capacity: ~~6-44~~ **10.0** vehicles per hour total.
- (d)(f) ~~Seven (7)~~ **Twelve (12)** spray coating areas for the application of undercoating, ~~collectively known as EU9, equipped with air atomization~~ **airless or HVLP** spray applicators, ~~collectively known as EU9~~, conducted in Plants **4, 5, 6, 101, 102, 103, 105, 110, 150, 205 210** and ~~Plant 240~~ **250**, all exhausted through general building ventilation, capacity: ~~3-99~~ **10.0** vehicles per hour total.
- (g) ~~Eleven (11)~~ **Twelve (12)** ~~parts and equipment~~ **manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals**, collectively known as EU10, conducted in Plant 4, exhausted through V29, and Plants 5, 6, 101, 102, 103, **105, 110, 150, 205, 210** and ~~Plant 250~~, all exhausted through general building ventilation, capacity: ~~6-44~~ **10.0** vehicles per hour total.

As a result of the changes in capacities of all of the emission units, the spreadsheets on Pages 1 - 6 of 6 of Appendix A have been revised and attached. The VOC potential emissions are 791 tons per year from the significant emission units and the potential HAPS are 419 tons per year. The source-wide VOC emissions including insignificant activities will be limited to 249 tons per year and if the HAPS are reduced proportionately, they will be 132 tons per year.

COMMENT 8

Condition C.19(a), Page 26 of 54, Please rewrite the second sentence of the condition to read: *"These records shall be kept at the source location for a minimum of three (3) years."* Reason - The text proposed in this comment is the exact statement of the rule. This rule does not specify a time frame for production of records, nor does this rule authorize IDEM/OAM to unilaterally impose an arbitrary time frame. Imposition of such a short time frame places a hardship on any business. As anyone with business experience knows, space is always at a premium. Any materials not needed for the immediate operational needs of the enterprise are usually boxed up and taken to a storage area. Even records vital to the operation of the company, such as sales records, production records, and time records are stored out of the way of daily operations. The records demanded by this condition hardly can be classified as normal business records and as such are likely to be kept in an even more remote located within the source. If at the time of the request, the person who knows where these records are kept is not on duty at the source, it may not be possible to find three year old records without a major search effort. A more reasonable time frame would be four days from the time of a written request. The Coachmen Recreational Vehicle-Indiana source is quite sizable. A demand for one hour availability of three years records is not reasonable. Any claims of experience to the contrary strains credibility.

RESPONSE 8:

This change has been implemented as shown in Item 29 for Condition C.19 (now C.18) (General Record Keeping Requirements).

COMMENT 9:

Description of Emission Unit, Page 29 of 54 - Please revise description (a) to read: *"One (1) frame spray coating area, known as EU-12, equipped with HVLP spray applicators, conducted at Plant 105 exhausted through S5 and S6. Capacity: 10 vehicle frame sets per hour."*

Please revise description (b) to read: *"Twelve (12) thinning and reducing areas, collectively known as EU-14, equipped with air assisted airless and HVLP applicators, conducted in Plant 4 exhausted through V29 and general building ventilation, Plant 5 exhausted through S1 and S2, and Plants 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve coating areas in aggregate: ten (10) vehicles per hour."* Reason - Because the potential emission of particulate matter, calculated pursuant to 326 IAC 1-2-55, is less than the allowable emission calculated pursuant to 326 IAC 6-3-2, the presence and operation of dry filters is not necessary to assure continuous compliance with 326 IAC 6-3-2. See Comment #12 below. Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some application of coatings subject to these conditions occurs in each of these buildings.

RESPONSE 9:

See Responses 1-7.

COMMENT 10:

Condition D.1.1(c), Page 29 of 54 - Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 10:

Since Condition C.1 has been deleted, Condition D.1.1(c) has been deleted and Condition D.4.1 has been added for the entire source. In addition, the same part of the Condition has been deleted in all other Section Ds..

~~(c) The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at EU12 & EU14 shall not exceed 2.00 tons per month. Therefore, the requirements of 326 IAC 2-2 do not apply.~~

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

COMMENT 11:

Condition D.1.3, Page 29 of 54, Please remove this condition in its entirety. Reason - As the dry filters are shown in Comment #12 below to be absolutely unnecessary for compliance with applicable particulate emission requirements for the frame spraying area and there are no control devices for the thinning and reducing areas, and because compliance with record keeping condition D.1.8 (a) will assure continuous compliance with applicable VOC rules, there is no equipment whose improper maintenance will cause any possibility of emissions in excess of the applicable requirements. All that is left is the spray guns themselves. The only failure mode for these guns is to clog up and cease spraying any material at all. This failure mode would cause all emissions to be zero until such time the guns are cleaned. Since there is no equipment whose maintenance is required to meet the requirements of conditions D.1.1 and D.1.2, this condition is extraneous.

RESPONSE 11:

Although Comment 12 shows that the dry filters are not required to meet the allowable PM emission rate calculated with a process weigh rate of ten (10) tons per hour, this is not the only reason to employ dry filters as explained in Response to Comment 12. Condition D.1.3, Preventive Maintenance, will be retained since the dry filters for PM control will be required to be in operation at all times.

COMMENTS 12 and 13:

Condition D.1.6, Page 30 of 54 - Please remove this condition in its entirety. Reason - The operation of the dry filters are not necessary to assure continuous compliance with condition D.1.2 and 326 IAC 6-3-2 (c).

Condition D.1.2 and 326 IAC 6-3-2 (c) limit particulate emissions from the frame painting operation to:

$$E = (4.1)(P^{0.67}) \quad \text{where } E \text{ is the allowable emission rate in lb/hr and} \\ \text{where } P \text{ is the Process Weight Rate in tons/hr}$$

In the frame painting process the process weight rate is 10 tons per hour, therefore:

$$E = (4.1)(10^{0.67}) = 19.2 \text{ lb/hr}$$

Particulate emissions from frame painting process are:

$$PM = \frac{(10.35 \text{ lb})}{(\text{gal})} \frac{(100\% - 56.19\%)(0.322 \text{ gal})}{(\text{frame set})} \frac{(10 \text{ frame sets})}{(\text{hr})} = 14.6 \text{ lb/hr}$$

As 14.6 lb/hr < 19.2 lb/hr, this part of the emission unit cannot possibly violate condition D.1.2 and 326 IAC 6-3-2 (c).

Please note that the particulate emission rate was calculated using the absolutely worst possible case assumption, that is that transfer efficiency equals zero and that all solids are sprayed into the atmosphere. This is certainly not the case. Transfer efficiency is between 65% and 75% in reality. Even with this assumption, PM < E, that is the worst-case particulate emission rate is less than the emission rate allowed by condition D.1.2 and 326 IAC 6-3-2 (c).

In the thinning and reducing process weight rate is 15.7 tons/hr. (Note that this is the absolute worst-case lowest process weight rate based on total production being entirely composed of the lightest product made by Coachmen Recreational Vehicles - Indiana. This is certainly not a likely scenario, it is used as the worst case.) Therefore:

$$E = (4.1)(15.7^{0.67}) = 25.9 \text{ lb/hr}$$

Particulate emissions from thinning and reducing are:

$$\begin{aligned} \text{PM} &= \frac{[(8.00 \text{ lb})(11\%)(0.085 \text{ gal})(8 \text{ units})]}{(\text{gal}) \quad (\text{unit}) \quad (\text{hr})} + \frac{[(9.5 \text{ lb})(5\%)(0.003 \text{ gal})(10 \text{ units})]}{(\text{gal}) \quad (\text{unit}) \quad (\text{hr})} \\ &= 0.76 \text{ lb/hr} \end{aligned}$$

As 0.76 lb/hr < 25.9 lb/hr, this part of the emission unit cannot possibly violate condition D.1.2 and 326 IAC 6-3-2 (c).

As with the frame spraying portion, the worst-case assumption of zero transfer efficiency was made in addition to the scenario that would allow least emissions.

Any belief that IDEM may have that the presence and operation of dry filters is required to assure continuous compliance with condition D.1.2 and 326 IAC 6-3-2 (c) would require that IDEM ignore the obvious facts in a blind rush to unfairly impose arbitrary and capricious conditions that obviously have no basis in lawfully promulgated rules. Such a belief and continued existence of this condition would not stand scrutiny of judicial review. Coachmen Recreational Vehicles - Indiana is aware that IDEM receives complaints about this type of facility at other sources. The mere existence of complaints does not constitute credible evidence of violation of the particulate rule. Most complainants are not conversant with air pollution rules. Most complaints either concern issues irrelevant to air pollution, or are extensions to long-standing vendettas begun over reasons other than air pollution rule violations. The very small potential particulate emission renders any argument of need to protect either the ambient air quality standards or the public health to be ludicrous on its face. IDEM grants permits on a daily basis that allow greater particulate emissions even after emission controls. Besides, 326 IAC 6-3 was promulgated to attain the ambient air standards and protect public health. IDEM has not shown any proof that the particulate emission from this emission unit constitutes any threat to public health.

Condition 1.7, Page 30 of 54 - Please remove this condition in its entirety. Reason - Part (a): Comment #12 above shows that the existence and operation of the dry filters is not required to comply with the applicable particulate emission requirements. As rigorously shown, no condition could possibly exist that would result in a violation of the applicable requirement. Hence, there is no need for a Compliance Response Plan element for these emission units.

Part (b): No part of the particulate rule says anything about accumulations of coating material on the roof or ground. This condition is not even relevant to air pollution. The accumulations would be on the ground and not in the atmosphere, hence not air pollution. Further, the mere fact that the droplets settled to the ground rather than floating off into the distance is *prima facie* evidence that the droplets were larger than 100 microns in aerodynamic diameter. These droplets being larger than the criteria set forth by 326 IAC 1-2-52 mean that they never did constitute an air pollutant and therefore beyond the regulatory authority of OAM. As shown in Comment #12, a certain amount of overspray is allowed by the applicable requirement and as such is certainly a normal occurrence.

Part (c): As shown in Comment #11, there is no equipment whose lack of maintenance could possibly cause a violation of the applicable requirement, and therefore any Preventive Maintenance measures would be an empty waste of Coachmen's time and money.

RESPONSES 12 and 13:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. The change is shown in Response 65.

COMMENT 14:

Condition D.1.9, Page 31 of 54 - Please remove this condition in its entirety. Reason - Comment #10 above withdrew the request for a voluntary limit on the emissions from these emission units. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 14:

In order to demonstrate compliance with the source-wide (including insignificant activities) VOC emission limit of 249 tons per twelve (12) consecutive month period, the quarterly report form is required to assure that PSD rules do not apply to this source has been moved to Condition D.4.7 and only record keeping is required to show compliance with 326 IAC 8-2-9 as specified Condition D.1.1. Therefore, Condition D.1.9 as follows as well as the Monthly Report Form that proposed daily reporting of the volume weighted average VOC content have been deleted. Similarly, Condition D.2.9 and D.3.6 have also been deleted.

~~D.1.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

COMMENT 15:

Description Section D.2, Page 32 of 54 - Please revise description (c) to read: *"Twelve (12) assembly areas, applying coatings to wood and plastic collectively known as EU-3, conducted in Plant 4 exhausted through V29 and general building ventilation, and Plants 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some application of coatings subject to these conditions occurs in each of these buildings.

RESPONSE 15:

See Response to Comments 1 - 7.

COMMENT 16:

Condition D.2.1(a), Page 32 of 54 - Please remove this condition in its entirety. Reason - The adhesives mentioned in the applications are applied to structural wood and plastic. None of these adhesives are applied to wood furniture or cabinets. This was unfortunately, not made clear in the application. In the course of investigating this section, two additional coatings were found to actually be applied to wood cabinets: 1) White Carpenter's Glue 0% VOC, Zero HAP, and 2) the stain blend (MSDS attached to these comments) applied by hand-wiping to the edges of some cabinets. The total VOC emission from application of these materials is 0.01 lb/hr. As the potential VOC emission from application to wood cabinets is less than 15 pounds per day, 326 IAC 8-2-12 does not apply pursuant to 326 IAC 8-2-1.

RESPONSE 16:

Since the surface coating is applied to only structural wood, and wood furnishings (wood furniture or cabinet coating operation), 326 IAC 8-2-12 is not applicable. Furthermore, since the booth was constructed prior to January 1, 1980, 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply either.

D.2.1 Volatile Organic Compound [326 IAC 8-2-12]

(a) ~~Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

~~Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip and Drain Application~~

~~High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

COMMENT 17:

Condition D.2.1(b), Page 32 of 54 Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 17:

See Response 10.

COMMENT 18:

Condition D.2.2, Pages 32 and 33 of 54 - Please remove this condition in its entirety. Reason - The amount of coating applied to applicable wood cabinets is less than the applicability thresholds for this regulation. Less than 50 gallons per year of the stain is applied source-wide, and the white carpenter's glue contains zero HAPS. Unfortunately, the application did not make it clear to the reviewer that adhesives stated in the application are applied to the structural lumber contained in the product, not the cabinets. Cabinet material is purchased precoated, and then stapled and glued (with zero-HAP white carpenter's glue) into cabinets which are then mechanically fastened to the product.

RESPONSE 18:

All references to NESHAP Subpart JJ have been removed from the proposed permit since the NESHAP does not apply to the structural wood. IDEM has determined that just installing wood cabinets does not constitute a manufacturer of wood furniture or wood furniture component.

COMMENT 19

Condition D.2.3, Pages 33 and 34 of 54 - Please remove this condition in its entirety. Reason - 40 CFR 63 (Subpart JJ) does not apply to this emission unit.

RESPONSE 19:

Proposed Condition D.2.3 has been deleted as shown below:

~~D.2.3—Work Practice Standards [40 CFR 63.803]~~

~~The owner or operator of an affected source subject to Subpart JJ shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:~~

- ~~(a)——Operator training course.~~
- ~~(b)——Leak inspection and maintenance plan.~~
- ~~(c)——Cleaning and washoff solvent accounting system.~~
- ~~(d)——Chemical composition of cleaning and washoff solvents.~~
- ~~(e)——Spray booth cleaning.~~
- ~~(f)——Storage requirements.~~
- ~~(g)——Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
- ~~(h)——Line cleaning.~~
- ~~(i)——Gun cleaning.~~
- ~~(j)——Washoff operations.~~
- ~~(k)——Formulation assessment plan for finishing operations.~~

COMMENT 20

Condition D.2.4, Page 34 of 54 - Please remove this condition in its entirety. Reason - There is no equipment in this section to maintain at all. No Preventive Maintenance Plan is possible.

RESPONSE 20:

This condition has been deleted.

~~D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

and is specifically not cited in Condition D.4.2 for this emission unit and EU12 and EU14.

COMMENT 21:

Condition D.2.6, Page 34 of 54 - Please remove this condition in its entirety. Reason - There are no emission limitation requirements that apply to this emission unit that require any determination of VOC content, or VOC emission rate.

RESPONSE 21:

The wording referring to VOC content has been deleted in Condition D.2.6 (now D.4.4). However, since there is a source-wide VOC emissions limit of 249 tons per twelve (12) consecutive month period, the VOC usage limitation language has been retained as shown:

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 2-4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

COMMENT 22:

Condition D.2.7, Page 34 of 54 - Please remove this condition in its entirety. Reason - There are no emission limitation requirements applicable to this emission unit that would require any record keeping at all. 326 IAC 8-2-12 would not have required any of the records specified in the draft. See Comment #16 above.

RESPONSE 22:

Record keeping requirements in Condition D.2.7 (now D.4.6) are necessary to show and verify compliance with the source-wide VOC emission limit. The references to HAPS have been deleted since Subpart JJ does not apply.

D.2.7 Record Keeping Requirements (General)

- (a) To document compliance with Condition D.42.1 the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.42.1.

- (1) The amount ~~as well as the~~ of VOC and HAPS content in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(4)~~(3) The cleanup solvent usage for each month;
 - ~~(5)~~(4) The total VOC and HAPS usage for each month; and
 - ~~(6)~~(5) The weight of VOCs and HAPS emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

COMMENT 23:

Condition D.2.8, Page 35 of 54 - Please remove this condition in its entirety. Reason - 40 CFR 63 (Subpart JJ) does not apply to this emission unit. See Comment #18 above.

RESPONSE 23:

This proposed condition has been deleted since Subpart JJ does not apply.

~~D.2.8 Record Keeping Requirements (40 CFR 63, Subpart JJ)~~

- ~~(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VHAP usage and/or limits established in Condition D.2.2.~~
- ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
 - ~~(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
 - ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~
 - ~~(4) The VHAP content in weight percent of each thinner used.~~
 - ~~(5) Copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~

- (b) ~~To document compliance with Condition D.2.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
- (c) ~~All records shall be maintained in accordance with Section C -- General Record Keeping Requirements, of this permit.~~

COMMENT 24:

Condition D.2.9, Page 35 of 54 - Please remove this condition in its entirety. Reason - Comment #17 above withdrew the request for a voluntary limit on the emissions from this emission unit. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 24:

See Response 10 and as explained in Response 14, Condition D.2.9 (Reporting Requirements) has been deleted.

COMMENT 25:

Description Section D.3, Page 36 of 54 - Please revise description (d) to read: *"Twelve (12) assembly areas, applying caulks and sealants collectively known as EU-7, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour.* Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some application of caulks and sealants subject to these conditions occurs in each of these buildings.

RESPONSE 25:

See Responses 1 -7

COMMENT 26:

Condition D.3.1(b), Page 36 of 54 - Please note that this condition only applies to use of Pemco adhesive which is pumped from a drum or pail to a gun that forms a bead for vehicle roof material. Reason - All other caulks and sealants used by Coachmen Recreational Vehicles - Indiana are exclusively used from tubes. There can be no cleanup solvent used in these tubes, and there is no reason whatsoever to use any solvent on these tubes. Tubes are disposed of as solid or special waste.

RESPONSE 26:

This condition is part of 326 IAC 8-2-9 and should coatings and solvents be sprayed in the future, it would apply. With the current applicators, the condition does not apply, however, the condition as it stands does not impose any additional requirements. Therefore, the condition has been retained.

COMMENT 27:

Condition D.3.1(c), Page 36 of 54 - Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 27:

Since Condition C.1 has been deleted, Condition D.2.1(b) has been replaced by the following source-wide VOC emission limit in Condition D.4.1.

~~(b) The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at EU7 shall not exceed 6.67 tons per month. Therefore, the requirements of 326 IAC 2-2 do not apply.~~

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

COMMENT 28:

Condition D.3.2, Page 36 of 54 - Please remove this condition in its entirety. Reason - Caulks and sealants are used from squeeze tubes. The failure mode for these tubes is to either exhaust all the product in the tube or to clog up and delivery no product. In either case no further emissions are possible. It makes no degree of sense to have a Preventive Maintenance Plan for squeeze tubes.

RESPONSE 28:

Condition D.3.2 has been deleted as follows:

~~D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

and is specifically not cited in Condition D.4.2 for this emission unit.

COMMENT 29:

Condition D.3.5(a)(1), Page 36 of 54 - Please remove the clause that reads "...and HAPS..." Reason - Condition D.3.1 (a) and 326 IAC 8-2-9 set no emission limitations for HAPS. Why would the permittee have to keep a record of HAPS when there is no specified limitation for HAP emissions? Record keeping costs money. No one objects to record keeping when there is an apparent environmental benefit, but when the record keeping is included for no environmental reason, such a requirement is costly and unproductive.

COMMENT 30:

Conditions D.3.5.(a)(5) and D.3.5 (a)(6) - Please remove the clause that reads "...and HAPS..." Reason - Condition D.3.1 (a) and 326 IAC 8-2-9 set no emission limitations for HAPS. Why would the permittee have to keep a record of HAPS when there is no specified limitation for HAP emissions? Record keeping costs money. No one objects to record keeping when there is an apparent environmental benefit, but when the record keeping is included for no environmental reason, such a requirement constitutes a pointless exercise.

RESPONSES 29 and 30:

The wording referring to HAPS has been removed from Condition D.3.5 (now D.2.4) as follows:

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D. ~~23.1~~ the Permittee shall maintain records in accordance with (1) through ~~(36)~~ below. Records maintained for (1) through ~~(36)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D. ~~23.1~~.
 - (1) The amount as well as the VOC ~~and HAPS~~ content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - ~~(4) The cleanup solvent usage for each month;~~
 - ~~(5) The total VOC and HAPS usage for each month; and~~
 - ~~(6) The weight of VOCs and HAPS emitted for each compliance period.~~
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

COMMENT 31:

Condition D.3.6, Page 37 of 54 - Please remove this condition in its entirety. Reason - Comment #27 above withdrew the request for a voluntary limit on the emissions from this emission unit. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 31:

See Response 10 and as explained in Response 14, Condition D.3.6 (Reporting Requirements) has been deleted.

COMMENT 32:

Description Section D.4, Page 38 of 54 - Please revise description (e) to read: *"Twelve (12) assembly areas, for the application of plumbing adhesives, collectively known as EU-8, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some application of plumbing adhesives subject to these conditions occurs in each of these buildings.

RESPONSE 32:

See Responses 1 - 7.

COMMENT 33:

Condition D.4.1, Page 38 of 54 - Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 33:

Since Condition C.1 has been deleted, Condition D.2.1(b) has been replaced by the following source-wide VOC emission limit in Condition D.4.1 and 326 IAC 2-2 has been added to the cite.

D.4.1 Volatile Organic Compound (VOC) [326 IAC 2-2]

~~The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at EU8 shall not exceed 0.450 tons per month. Therefore, the requirements of 326 IAC 2-2 do not apply.~~

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

COMMENT 34:

Section D.4, Page 38 of 54 - As this Section deals with application of adhesives to plastic piping, no part of 326 IAC 8-2 or 326 IAC 8-5 applies. The potential emission of VOC (reflecting a capacity of ten (10) vehicles per hour) is 14.08 tons per year. Therefore, neither 326 IAC 8-1-6 nor 326 IAC 8-6 apply regardless of construction date. There are no VOC rules that apply to this emission unit.

RESPONSE 34:

No change is required due to this comment.

COMMENT 35:

Condition D.4.2, Page 38 of 54 - Please remove this condition in its entirety. Reason - ABS pipe cement is manually applied from swab bottles. The failure mode for these bottles is to exhaust all the product in the bottle. In this case no further emissions are possible. There are no emission control devices associated with this emission unit. It is unreasonable to demand a Preventive Maintenance Plan for swab bottles.

RESPONSE 35:

This proposed condition has been deleted.

~~D.4.2 — Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

and this emission unit has not been cited in Condition D.4.2.

COMMENT 36:

Condition D.4.3, Page 38 of 54 - Please remove this condition in its entirety. Reason - As there are no Emission Limitations or Standards applicable to this emission unit, an emission testing requirement cannot be required to determine compliance. Against what standard would one conduct a test?

RESPONSE 36:

The VOC content of any given coating against that specified in an MSDS can be tested.

COMMENT 37:

Condition D.4.4, Page 38 of 54 - Please remove this condition in its entirety. Reason - As condition D.4.1 was eliminated by comment #33, there are no VOC content or usage limitations that apply to this emission unit. It does not make sense to require formulation data when there is no applicable VOC content or usage standard.

RESPONSE 37:

The wording referring to VOC content has been deleted in Condition D.4.4 (now in new Condition D.4.4) ever, since there is a source-wide VOC emissions limit of 249 tons per twelve (12) consecutive month period, the VOC usage limitation language has been retained as shown:

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC ~~content~~ and usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

COMMENT 38:

Condition D.4.5, Page 38 of 54 - Please remove this condition in its entirety. Reason - As pointed out in Comment #37, there are no applicable requirements for VOC or HAP content or for material usage. As a result a requirement for record keeping has equally no validity.

RESPONSE 38:

The wording referring to HAPS has been removed from Condition D.4.5 (now in D.4.6) as follows:

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1 the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.4.1.
 - (1) The amount ~~as well as the~~ of VOC and ~~HAPS content~~ in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(4)~~ (3) The cleanup solvent usage for each month;
 - ~~(5)~~ (4) The total VOC and ~~HAPS~~ usage for each month; and
 - ~~(6)~~ (5) The weight of VOCs and ~~HAPS~~ emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

COMMENT 39:

Condition D.4.6, Page 39 of 54 - Please remove this condition in its entirety. Reason - Comment #33 above withdrew the request for a voluntary limit on the emissions from this emission unit. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 39:

In order to demonstrate compliance with the source-wide (including insignificant activities) VOC emission limit of 249 tons per twelve (12) consecutive month period, the quarterly report form is required to assure that PSD rules do not apply to this source and has been retained as Condition D.4.7.

COMMENT 40:

Description Section D.5, Page 40 of 54 - Please revise description (f) to read: *"Twelve (12) spray coating areas, for the application of undercoating, equipped with airless or HVLP spray equipment, collectively known as EU-9, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve assembly areas in aggregate: ten (10) vehicles per hour."* Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some application of undercoating subject to these conditions occurs in each of these buildings.

RESPONSE 40:

See Responses 1 - 7.

COMMENT 41:

Condition D.5.1 (c), Page 40 of 54 - Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 41:

Since Condition C.1 has been deleted, Condition D.5.1(c) has been replaced by the source-wide VOC emission limit in Condition D.4.1.

COMMENT 42:

Condition D.5.3, Page 40 of 54 - Please remove this condition in its entirety. Reason - This emission unit has no emission control equipment associated with it. The process equipment - the spray guns only have one failure mode, and that is to clog up and apply no product and cause zero emissions. Therefore, no amount of neglect of the equipment will cause emission to exceed allowable quantities. Conditions D.5.5 and D.5.7 (a) below continuously assure compliance with the applicable VOC requirement, and the potential particulate emission is shown in Comment #43 below to be less than the allowable emission rate.

RESPONSE 42:

Preventive maintenance for this emission unit has been deleted as shown in Condition D.5.3 (now Condition D.4.2).

COMMENT 43:

Condition D.5.6(a), Page 41 of 54 - Please remove this condition in its entirety. Reason - Condition D.5.2 and 326 IAC 6-3-2 (c) do not call for **zero** overspray. As the minimum process weight rate for this process, which is done at the end of the production process for motorized vehicles only, is [(10 units/hr)(11,900 lb/unit)(1 ton/2,000 lb) = 59.5 tons/hr]. From 326 IAC 6-3-2 (c) the allowable particulate emission rate is calculated using the equation:

$$E = (55.0)(P^{0.11}) - 40 \quad \text{where E is the allowable emission rate in lb/hr and} \\ \text{where P is the process weight rate in tons/hr}$$

In this case P = 59.5, therefore:

$$E = (55.0)(59.5^{0.11}) - 40 = 46.21 \text{ lb/hr}$$

The potential hourly particulate emission rate is:

$$PM = \frac{(7.34 \text{ lb})}{(\text{gal})} \frac{(100\% - 47\%)(0.982 \text{ gal})}{(\text{unit})} \frac{(10 \text{ units})}{(\text{hr})} = 38.20 \text{ lb/hr}$$

Since 38.20 lb/hr < 46.21 lb/hr the process complies with the applicable rule without benefit of any emission controls. As in Comment #12 above the calculation of PM emissions was made assuming a transfer efficiency of zero. As the actual transfer efficiency is probably around 75%, the actual emission is probably a quarter of the calculated figure, so there is a considerable margin for error built into these calculations. There is no possibility of violation of the applicable requirement, and therefore no need for a Compliance Response Plan. 326 IAC 6-3 was promulgated to attain the national/ambient air standards and maintain public health, so compliance with this rule presumably meets those goals.

Further, any accumulation on the floor is *prima facie* evidence that the overspray droplets (if any) were large and massive enough to fall out of the atmosphere. Such massive particles would necessarily have a diameter in excess of 100 microns and hence not be considered particulate matter by the promulgated definition, and therefore not air pollution. Further, anything adhering to the floor is certainly not air pollution.

Finally, this process is done well away from any building doors, so any overspray will have plenty of time to adhere to the floors or to product vehicles. Plant housekeeping and product quality are beyond the purview of the air pollution rules.

RESPONSE 43:

See Response 12.

COMMENT 44:

Condition D.5.6(b), Page 41 of 54 - Please delete this condition in its entirety. Reason - As shown in Comment #42 above, there is no equipment to justify a Preventive Maintenance Plan. Since there can be no plan, then any condition referring to additional inspections or measures of such a plan is referring to a null set.

RESPONSE 44:

Preventive Maintenance has been deleted for this emission unit.

COMMENT 45:

Condition D.5.7(a)(1), Page 41 of 54 - Please delete the clause in the first sentence that reads: "...and HAPS..." from the condition. Reason - Condition D.5.1 and 326 IAC 8-2-9 do not set any emission limitations or standards that refer to HAPS. There is no reason to keep a record of HAPS if there is no emission limitation. The point of this condition is to continuously show compliance with the applicable requirements, not impose irrelevant and costly record keeping.

COMMENT 46:

Conditions D.5.7(a)(5) and D.5.7(a)(6), Page 41 of 54 - Please delete the clause that reads: "... and HAPS..." from these conditions. Reason - Condition D.5.1 and 326 IAC 8-2-9 do not set any emission limitations or standards that refer to HAPS. There is no reason to keep a record of HAPS if there is no emission limitation. The point of this condition is to continuously show compliance with the applicable requirements, not impose irrelevant and costly record keeping.

RESPONSES 45 and 46:

The wording referring to HAPS has been removed from Condition D.5.7 (now D.3.6) as follows:

D.5.7 Record Keeping Requirements

- (a) To document compliance with Condition D.35.1 the Permittee shall maintain records in accordance with (1) through (36) below. Records maintained for (1) through (36) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.35.1.

- (1) The amount as well as the VOC ~~and HAPS~~ content in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
- (b) To document compliance with Conditions D.35.2, and D.35.6, the Permittee shall maintain a log of **monthly** ~~daily overspray observations and weekly~~ inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

COMMENT 47:

Condition D.5.7(b), Page 41 of 54 - Please remove this condition in its entirety. Reason - Comments #43 and #44 above discredited condition D.5.6 and requested its removal. This condition imposes record keeping to support that discredited and irrelevant condition, and as such is equally discredited.

RESPONSE 47:

Since these conditions have been retained, Condition D.5.7(b) (now D.3.6(b)) has also been retained.

COMMENT 48:

Condition D.5.8, Page 41 of 54 - Please remove this condition in its entirety. Reason - Comment #41 above withdrew the request for a voluntary limit on the emissions from this emission unit. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 48:

In order to demonstrate compliance with the source-wide (including insignificant activities) VOC emission limit of 249 tons per twelve (12) consecutive month period, the quarterly report form is required to assure that PSD rules do not apply to this source as required in Condition D.4.1. Condition D.3.7 is required to show compliance with Condition D.3.1 pursuant to 326 IAC 8-2-9.

COMMENT 49:

Description Section D.6, Page 42 of 54 - Please revise description (g) to read: *"Twelve (12) manual product cleaning areas, for the manual wipe degreasing of product prior to application of decals, collectively known as EU-10, conducted in Plants 4, 5, 6, 101, 102, 103, 105, 110, 150, 205, 210, and 250, all exhausted through general building ventilation. Capacity of twelve cleaning areas in aggregate: ten (10) vehicles per hour."* Reason - Application misstated capacity of this facility. Actual capacity is ten (10) vehicle frames per hour. Some manual product cleaning subject to these conditions occurs in each of these buildings.

RESPONSE 49:

See Responses 1 - 7.

COMMENT 50:

Condition D.6.1, Page 42 of 54 - Please remove this condition in its entirety. Reason - The limitation in the as-drafted permit is due to a voluntary limitation requested in the application of 5,200 hours per year of operation. Coachmen Recreational Vehicle - Indiana hereby withdraws the requests for voluntary limitation to emissions from this facility. Compliance with condition C.1 (Page 20 of 54) will prevent applicability of 326 IAC 2-2 and 40 CFR 52.21. Applicability of these rules is triggered by the potential emission of the **source** exceeding major source levels. Compliance with condition C.1 will enforceably limit the VOC emission from the **source** to less than major source levels.

RESPONSE 50:

See Response 10.

COMMENT 51:

Condition D.6.2, Page 42 of 54 - Please remove this condition in its entirety. Reason - This emission unit consists of using various solvents and paper towels or shop rags to degrease product surfaces. There is no failure mode for a paper towel or shop rags that would cause a violations of any applicable requirement. There are no emission control devices associated with this emission unit. It is not reasonable to demand a Preventive Maintenance Plan for paper towels and shop rags.

RESPONSE 51:

Since the solvents are stored in containers that should retained closed when not in use, this condition will be retained.

COMMENT 52:

Condition D.6.3, Page 42 of 54 - Please remove this condition in its entirety. Reason - As there are no Emission Limitations or Standards applicable to this emission unit, an emission testing requirement cannot be required to determine compliance. There is no point in conducting any tests to demonstrate compliance if there is no underlying emission limitation.

RESPONSE 52:

VOC content of any given coating against that specified in an MSDS can be tested.

COMMENT 53:

Condition D.6.4, Page 42 of 54 - Please remove this condition in its entirety. Reason - As condition D.6.1 was eliminated by comment #50, there are no VOC content or usage limitations that apply to this emission unit. It makes no sense to require formulation data when there is no applicable VOC content or usage standard.

COMMENT 54:

Condition D.6.5, Pages 42 and 43 of 54 -Please remove this condition in its entirety. Reason - As pointed out in Comment #52, there are no applicable requirements for VOC or HAP content or for material usage. As a result a requirement for record keeping has equally no validity.

RESPONSES 53 and 54:

The wording referring to HAPS has been removed from Condition D.6.4 (now D.4.6) as follows:

D.6.4 Record Keeping Requirements

- (a) To document compliance with Condition D.46.1 the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.46.1.
 - (1) The amount ~~as well as the~~ of VOC and HAPS content in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(4)~~ (3) The cleanup solvent usage for each month;
 - ~~(5)~~ (4) The total VOC and HAPS usage for each month; and
 - ~~(6)~~ (5) The weight of VOCs and HAPS emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

COMMENT 55:

Condition D.6.6, Page 43 of 54 - Please remove this condition in its entirety. Reason - Comment #50 above withdrew the request for a voluntary limit on the emissions from this emission unit. A quarterly report, submitted pursuant to Condition C.1 for the entire source, will suffice to make the PSD rules not applicable to this source.

RESPONSE 55:

See Response 10.

COMMENT 56:

Quarterly Compliance Reports, Pages 49, 50, 51, 52, 53, and 54 of 54 - Please eliminate these report forms and replace them with a single source-wide report form, pursuant to condition C.1 on page 20 of 54. Reason - In previous Comments (#10, #14, #17, #24, #27, #31, #33, #39, #41, #48, #50, and #55), Coachmen Recreational Vehicles - Indiana has completely withdrawn all requests for voluntary limitations on specific emission unit emissions and replaced those with a source-wide VOC emission limit as stated in Condition C.1. As this source has never actually operated as a major source for purposes on the PSD rules 326 IAC 2-2 and 40 CFR 52.21, Coachmen requests to enforceably continue to operate the source as a "synthetic minor" source as defined by these rules. As the applicability of these rules depends on source wide emissions, using a source-wide emission limit keeps the non-applicability of these rule clear to all.

RESPONSE 56:

The individual Quarterly Report Forms have been replaced by a source-wide form as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Coachmen Recreational Vehicle - Indiana
Source Address: 423 North Main Street, Middlebury, Indiana 46540
Mailing Address: P.O. Box 30, Middlebury, Indiana 46540
Part 70 Permit No.: T 039 - 6922-00062
Facilities: Entire Source, Including Insignificant Activities
Parameter: Volatile Organic Compounds
Limit: 249 tons per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

COMMENT 57:

Technical Support Document, Emission Unit Descriptions Pages 1 and 2 of 10 - Please revise these emission unit descriptions to read as described in Comments #9, #15, #25, #32, #40 and #49. Reasons - To furnish a more accurate description of the source and its component emission units.

RESPONSE 57:

The changes have been incorporated in the permit as shown in Responses 1-7.

COMMENT 58:

Technical Support Document, Limited Potential to Emit, Pages 5 and 6 of 10 - Please revise this table to reflect a single source-wide limit. Reason - Coachmen has systematically withdrawn voluntary requests for individual emission unit limitations in favor of a source-wide VOC emission limitation.

RESPONSE 58:

See Responses 1-7.

COMMENT 59:

Technical Support Document, Federal Rule Applicability (b), Page 7 of 10 - Please remove (b) in its entirety, or alternately explain why the federal regulation does not apply. Reason - As explained in Comment #18, 40 CFR 63 (Subpart JJ) does not apply to this source. Most of the products applied to wood are applied to structural lumber, not to cabinets. The amount of HAP-containing coatings applied to cabinets is less than the threshold of applicability for this regulation.

RESPONSE 59:

All references to this NESHAP have been deleted from the proposed permit.

COMMENT 60:

Technical Support Document, State Rule Applicability - Individual Facilities, 326 IAC 6-3-2, Page 8 of 10 - Please remove the reference to "EU-12 and EU-14 will comply by the use of dry filters." Reason - As shown in Comments #12, #13, and #43, the use of dry filters is not necessary to comply with 326 IAC 6-3-2 (c) in the surface coating areas.

RESPONSE 60:

As stated above, the dry filters will be required.

COMMENT 61:

Technical Support Document - Appendix A, Pages 1-6 of 6 - Please revise all calculations based on 10 units per hour capacity. Reason - Revised capacity per Comments.

RESPONSE 61:

See Responses 1-7.

On November 5, 1998, Earl Handshoe, Jr., Coachmen Industries, Inc., also submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

COMMENT 62:

Condition D.1.1 (c) page 30 of 50; Condition D.2.1 page 33 of 50; Condition D.3.1 (c) page 35 of 50; Condition D.4.1 page 37 of 50; Condition D.5.1 (c) page 39 of 50; Condition D.6.1 page 42 of 50.

Please remove these conditions from Section D and replace them with one condition containing the same language in Section C: This language could be as follows:

The volatile organic compound (VOC) delivered to the applicators including clean-up solvents at the entire source including all insignificant activities shall not exceed 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

The basis for this request is that all of the above mentioned conditions state the exact same requirements for the entire source. Since Section C of the proposed permit deals with what is required for the entire source, those conditions should be moved to that section. This makes it clear from the face of the permit that if in the unlikely event that the 249 ton cap is exceeded then only one (not twelve) condition(s) is violated.

RESPONSE 62:

This language has been incorporated in Condition D.4.1 for the entire source.

COMMENT 63:

Conditions D.1.9 (a) page 32 of 50; Condition D.2.5 (a) & (b) page 33 of 50; Condition D.3.5 (a) & (b) page 36 of 50; Condition D.4.5 (a) & (b) page 37 of 50; Condition D.5.8 (a) page 40 of 50; Condition D.6.6 (a) & (b) page 42 of 50.

Please remove the conditions from Section D and replace them with one condition containing the same language in Section C: This language could be as follows:

- (a) To document compliance with the volatile organic compound (VOC) emissions from the entire source, the permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emissions limits established in Section C (from Comment #1)
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

The basis for this request is that all of the above mentioned conditions state the exact same requirement for the entire source. Since Section C of the proposed permit deals with what is required for the entire source, those conditions should be moved to that section. This makes it clear from the face of the permit that calculations do not have to be made separately for each operation, and that it is unnecessary to maintain multiple copies of the same records in order to comply with the record keeping provision of the permit. Further, any violation is of one condition, not twelve.

RESPONSE 63:

The cited record keeping conditions are not identical for each of the emission units in Sections D.1 through D.6. The emission units in Sections D.1, D.3 and D.5 (now D.1, D.2 and D.3) are subject to 326 IAC 8-2-9 and as such require record keeping of the VOC content, volume weighted averages and the differentiation of VOC from solvents versus that from coatings, whereas those in Sections D.2, D.4 and D.6 (now all in D.4) do not require record keeping for volume weighted averages. In addition, the emission units in Sections D.1 and D.3 need to document compliance with the overspray monitoring conditions. The reorganizations of Sections and the incorporation of Section D.4 for the entire source accomplishes the suggested goal.

COMMENT 64:

Condition D.1.10 page 32 of 50; Condition D.2.6 page 34 of 50; Condition D.3.6 page 36 of 50; Condition D.4.6 page 38 of 50; Condition D.5.9 page 41 of 50; Condition D.6.7 page 43 of 50.

Please remove these conditions from Section D and replace them with one condition containing the same language in Section C: This language could be as follows:

A quarterly summary of the information to document compliance with the VOC usage limits and the VOC emission limits established in Section C – General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The basis for this request is that all of the above mentioned conditions state the exact same requirement for the entire source. Since Section C of the proposed permit deals with what is required for the entire source, those conditions should be moved to that section.

RESPONSE 64:

The suggested language is from the cited condition entitled, Reporting Requirements in each Section D. However, the same Quarterly Report Forms are not required for each emission unit and thus, the conditions can not be replaced by a single overall reporting requirement condition in Section C. See Responses 10 and 14.

COMMENT 65:

Condition D.1.8 (a) page 31 of 50.

Please modify this condition to require weekly, rather than daily, inspections to verify the placement, integrity, and particle loading of the filters. Therefore this condition should read as follows:

Weekly inspections to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1, S2, S5 and S6 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

The basis for this request is that Condition D.1.7 requires filters to be in operation at all times when EU12 and EU14 are in operation. It is unnecessary to inspect filters every day to be reasonably certain they are in proper operation. Further, these requirements are a belt and suspenders approach when no problems have been demonstrated. Overspray is merely an indicator that the control systems are not working properly, but we are already required to keep the filters in operation continuously and to inspect them regularly. Daily overspray inspections might be appropriate temporarily if there were a demonstrated history of noncompliance, but that is not the case with this facility. Daily inspections of filters and overspray from the stacks requires at least 15 minutes away from a work station to interrupt the work, go to the filters, go to the roof, inspect, return, record, and get back to production – on good weather days. On bad weather days it could easily take twice this long. Further, anytime workers have to go up and down to a roof significantly increases their chance of injury, especially in inclement weather.

RESPONSE 65:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and Potential to

Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Therefore, Condition D.1.8(a)(now D.1.7(a)) has been revised to relax the frequency of overspray observations from daily to weekly and Condition 1.8(b) (now Condition D.1.7(b)) has been relaxed to require only monthly inspections as follows. The daily inspections to verify the placement and integrity of the filters has been retained.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, **weekly** ~~daily~~ observations shall be made of the overspray from the surface coating booth stacks S1, S2, S5 and S6 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) **Monthly** ~~Weekly~~ inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

In addition, Condition D.1.10(b) (now D.1.8(b)) has been changed to agreed with Condition D.1.7

- (b) To document compliance with Conditions D.1.2, and D.1.7, the Permittee shall maintain a log of **weekly** ~~daily~~ overspray observations, daily and **monthly** ~~weekly~~ inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

COMMENT 66:

Condition D.5.3 page 39 of 50.

Please remove this condition from the permit.

This request is based on the only equipment used in EU9 is spray guns, there are no filters or control equipment associated with this emission unit. The only failure mode is clogging which prevents overspray. Therefore, a preventative maintenance plan is not applicable to this emission unit.

RESPONSE 66:

The PMP for EU9 in Condition 5.3 has been deleted and is not specifically required in Section D.3 or in Condition D.4.2.

COMMENT 67:

General Comment.

We believe it is unreasonable to require rooftop and ground overspray inspections when it is not required by rule, other states do not require it, and it is merely a gross indicator of an operational problem that would be otherwise identified by more direct and real-time methods.

In addition, as noted above this can cause up to 15-30 minutes of lost production time per inspection, which is a substantial and unnecessary cost in and of itself.

In the aggregate, such requirements make Indiana operations less competitive with operations in neighboring states, with no demonstrable significant environmental advantage.

RESPONSE 67:

See response to Comment 65 which relaxed the frequency of inspections for rooftop and ground overspray to monthly from weekly.